

### **REMARKS**

Applicant has carefully studied the outstanding Office Action. The present amendment is intended to place the application in condition for allowance and is believed to overcome all of the objections and rejections made by the Examiner. Favorable reconsideration and allowance of the application are respectfully requested.

Applicant has amended claims 1, 2, 8, 10, 17, 19 and 20 to more properly claim the present invention. No new matter has been added. Claims 1 - 20 are presented for examination.

In Paragraphs 1 and 2 of the Office Action, claims 1, 5 - 8, 10, 14 - 17, 19 and 20 have been rejected under 35 U.S.C. §102(e) as being anticipated by Ranganathan, U.S. Patent No. 5,754,170 ("Ranganathan").

In Paragraphs 3 and 4 of the Office Action, claims 2 - 4 and 11 - 13 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Ranganathan in view of Spilo et al., U.S. Patent No. 6,298,422 ("Spilo").

In Paragraph 5 of the Office Action, Claims 9 and 18 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Ranganathan in view of Sugiyama et al., U.S. Patent No. 6,289,137 ("Sugiyama").

#### **Distinctions between Claimed Invention and U.S. Patent No. 5,754,170 to Ranganathan in view of U.S. Patent No. 6,298,422 to Spilo et al. and further in view of U.S. Patent No. 6,289,137 to Sugiyama et al.**

The present invention concerns modification of a display screen prior to display of a window, when the size and location of the window is such that its background covers a copy protected image. Such modification prevents the window from absorbing copy protected image data into its background, in case the window is defined so as to have a transparent background.

Ranganathan concerns overlaying a movie from a real-time video source such as a television receiver, video camera or CD-ROM, on a graphics display screen. (Ranganathan / col. 1, lines 19 - 25) Specifically, movie data overlays graphics data, so that graphics data behind the movie is not displayed. (Ranganathan / FIGS. 2 and 10) Ranganathan describes an efficient system for selectively combining graphics output from a CRT FIFO and a movie FIFO, which does not require fetching of un-displayed pixels into the CRT FIFO. Instead, Ranganathan uses dummy CRT fetches to maintain synchronization between the CRT FIFO and

the graphics display while movie data is being displayed. During dummy fetches, no graphics pixels are physically fetched from the graphics memory to the CRT FIFO, and the graphics controller is fooled into thinking that actual CRT fetches are occurring. A fetch counter for the CRT FIFO counts true fetches when graphics pixels are written to the CRT FIFO, and counts dummy fetches when no graphics pixels are written to the CRT FIFO. (Ranganathan / col. 4, lines 23 – 29; FIG. 6)

Unlike Ranganathan, which involves (i) displaying graphics data for part of a display screen from a CRT FIFO, and (ii) displaying movie data from a movie FIFO, instead of graphics data from the CRT FIFO, within a movie window; the present invention involves four phases. Specifically, the present invention (i) displays graphics data for an entire display screen; (ii) detects an event, such as by the use of system-wide hooks, whereby a window is going to be placed over a part of the screen where a copy protected image is being displayed; (iii) modifies the graphics data for the display screen prior to occurrence of such event, if notification is received that such an event is about to occur; and (iv) displays the window over the modified graphics data.

Spilo concerns reducing memory and CPU resources consumed by running but inactive application programs, within a multitasking operating system.

Sugiyama concerns an image processing apparatus, such as a fax machine, which scans image data at a first resolution and prints half-tone data at a second resolution. Sugiyama describes conversion from the first resolution to the second resolution using specially constructed luminance/density conversion tables.

In Paragraph 2 of the Office Action, the Examiner cites claim 9 of Ranganathan, col. 14, lines 57 – 67, indicating that Ranganathan teaches “*replacing the portion of the screen pixel data with substitute pixel data, prior to the second window being displayed*”. Applicant respectfully submits that, if the “*movie pixels*” and the “*non-displaying graphics pixels*” (the dummy fetches) referred to in claim 9 of Ranganathan correspond respectively to the “*window*” and the “*substitute pixel data*” in claim 1 of the present application, then Ranganathan does not replace a portion of the screen pixel data with substitute pixel data prior to the movie being displayed. Indeed, this would correspond to erasing the background behind the movie window prior to rendering the movie window itself, and is not performed or described in Ranganathan.

In order to further clarify the distinction between the present invention and Ranganathan, applicant has amended independent claims 1, 10, 19 and 20 to include the four phases mentioned hereinabove. In particular, applicant has

amended the independent claims to expressly include the limitations of displaying both the substitute pixel data and the window. This clearly distinguishes over Ranganathan, since Ranganathan indicates that *"no graphics pixels are physically fetched from the graphics memory to the CRT FIFO during the dummy fetches"* (Ranganathan / col. 4, lines 37 – 39), and FIG. 5A of Ranganathan shows that the movie FIFO overrides the CRT FIFO within the movie envelope (Ranganathan / col. 7, lines 17 – 19).

The rejections of claims 1 - 20 in paragraphs 1 - 5 of the Office Action will now be dealt with specifically.

As to amended independent method claim 1, applicant respectfully submits that the limitations in claim 1 of:

*"replacing at least the portion of the screen pixel data with substitute pixel data prior to the window being displayed",*

*"displaying the substitute pixel data", and*

*"displaying the window over at least a portion of the substitute pixel data"*

are neither shown nor suggested in Ranganathan, Spilo or Sugiyama, taken individually or in combination, as explained hereinabove.

Because claims 2 - 9 depend from claim 1 and include additional features, applicant respectfully submits that claims 2 - 9 are not anticipated or rendered obvious by Ranganathan, Spilo, Sugiyama, or a combination of Ranganathan, Spilo and Sugiyama.

Accordingly claims 1 - 9 are deemed to be allowable.

As to amended independent system claim 10 applicant respectfully submits that the limitations in claim 10 of:

*"a pixel processor for replacing at least the portion of the screen pixel data with substitute pixel data prior to the window being displayed", and*

*"a display processor for displaying the screen pixel data and the substitute pixel data, and for displaying the window over at least a portion of the substitute pixel data"*

are neither shown nor suggested in Ranganathan, Spilo or Sugiyama, taken individually or in combination.

Because claims 11 - 18 depend from claim 10 and include additional features, applicant respectfully submits that claims 11 - 18 are not anticipated or rendered obvious by Ranganathan, Spilo, Sugiyama, or a combination of Ranganathan, Spilo and Sugiyama.

Accordingly claims 10 - 18 are deemed to be allowable.

As to amended independent method claim 19 applicant respectfully submits that the limitations in claim 19 of:

*"replacing at least the portion of the screen pixel data with substitute pixel data prior to the window being displayed",*

*"displaying the substitute pixel data", and*

*"displaying the window over at least a portion of the substitute pixel data"*

are neither shown nor suggested in Ranganathan, Spilo or Sugiyama, taken individually or in combination.

Accordingly claim 19 is deemed to be allowable.

As to amended independent system claim 20 applicant respectfully submits that the limitations in claim 20 of:

*"a pixel processor for replacing at least the portion of the screen pixel data with substitute pixel data prior to the window being displayed", and*

*"a display processor for displaying the screen pixel data and the substitute pixel data, and for displaying the window over at least a portion of the substitute pixel data"*

are neither shown nor suggested in Ranganathan, Spilo or Sugiyama, taken individually or in combination.

Accordingly claim 20 is deemed to be allowable.

**Support for Amended Claims in Original Specification**

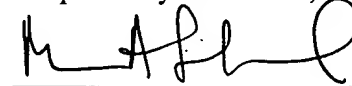
Amended claims 1, 2, 8, 10, 17, 19 and 20 are supported in the original specification in FIGS. 9 and 10 and the discussions thereof in the original specification.

For the foregoing reasons, applicant respectfully submits that the applicable objections and rejections have been overcome and that the claims are in condition for allowance.

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Respectfully submitted,



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